

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CBV, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 21-1456-MN
	)	
CHANBOND, LLC, DEIRDRE LEANE, and	)	
IPNAV, LLC,	)	
	)	
Defendants.	)	

**MOTION TO FILE UNDER SEAL**

Defendant ChanBond LLC (“ChanBond”) respectfully moves this Court pursuant to Federal Rule of Civil Procedure 5.2, and Local Rule of Civil Practice and Procedure of the United States District Court for the District of Delaware 5.1.3 for entry of an order authorizing ChanBond to file its Answering Brief in Opposition to Plaintiff CBV, Inc.’s Motion for Temporary Restraining Order, Preliminary Injunction, and Expedited Discovery (D.I. 18) (the “Motion”) under seal. CBV, Inc. (“CBV”), Deirdre Leane, and IPNAV, LLC do not oppose.

CBV filed its Opening Brief in Support of the Motion on March 15, 2022 (D.I. 19) under seal. The Opening Brief in Support of the Motion sets forth information regarding ChanBond’s confidential business information. ChanBond’s Answering Brief in Opposition to the Motion contains the same. Accordingly, ChanBond respectfully submits that good cause exists to seal its Answering Brief in Opposition to the Motion to protect the interests of one or both parties against public dissemination of the confidential information contained within ChanBond’s Answering Brief in Opposition to the Motion.

ChanBond will comply with all applicable local rules and procedures regarding filing under seal through the Court's CM/ECF system, including the requirement to file a redacted version within seven (7) days of filing the sealed document.

ChanBond, therefore, respectfully requests entry of the attached order permitting the filing of its Answering Brief in Opposition to the Motion under seal.

Dated: March 31, 2022

Respectfully submitted,

BAYARD, P.A.

/s/ Stephen B. Brauerman

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*Attorneys for Defendant ChanBond, LLC.*

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1**

I hereby certify, pursuant to D. Del. LR 7.1.1, that reasonable efforts have been made to reach agreement with opposing counsel on the matters set forth above and CVB, Inc., Deirdre Leane, and IPNAV, LLC do not oppose ChanBond, LLC's Motion to File Under Seal.

Dated: March 31, 2022

/s/ Stephen B. Brauerman  
Stephen B. Brauerman (No. 4952)